

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

50 California Street, 22nd Floor

4 San Francisco, California 94111-4788

Telephone: (415) 875-6600

5 Facsimile: (415) 875-6700

6 Attorneys for GOOGLE LLC

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA

9 SAN FRANCISCO DIVISION

10 GOOGLE LLC,

11 Plaintiff,

12 vs.

13 SONOS, INC.,

14 Defendants.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
MOTION FOR LEAVE**

1 I, Lindsay Cooper, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an partner at Quinn Emanuel Urquhart & Sullivan LLC
4 representing Google LLC (“Google”) in this matter. I make this declaration in support of
5 Google’s Motion for Leave to File a Second Amended Complaint (“Motion”). If called as a
6 witness, I could and would testify competently to the information contained herein.

7 2. Attached as Exhibit 1 is a true and correct copy of Google’s proposed Second
8 Amended Complaint.

9 3. Attached as Exhibit 2 is a true and correct copy of a redline showing changes made
10 in Google’s Second Amended Complaint from the First Amended Complaint.

11 4. Attached as Exhibit 3 is a true and correct copy of the Content Integration
12 Agreement entered into by Sonos and Google.

13 5. Attached as Exhibit 4 is a true and correct copy of the “Response to Final Office
14 Action Mailed September 9, 2019” filed by Sonos with the U.S. Patent and Trademark Office in
15 the Case No. 11-1001-CON0419.

16 6. Attached as Exhibit 5 is a true and correct copy of excerpts of Google’s Motion to
17 Transfer Pursuant to 28 U.S.C. § 1404(a) filed in *Sonos, Inc. v. Google LLC*, Case No. 6:20-
18 cv-00881-ADA (W.D. Tex. 2020).

19 7. Attached as Exhibit 6 is a true and correct copy of Plaintiff Sonos’s Second Set of
20 Interrogatories to Defendant Google (Nos. 6-11).

21 8. Attached as Exhibit 7 is a true and correct copy of email communications between
22 Cole Richter and Nima Hefazi in November 2021.

23 I declare under penalty of perjury that to the best of my knowledge the foregoing is true
24 and correct. Executed on November 16, 2021, in Mill Valley, California.

25 DATED: November 16, 2021

26 By: /s/ Lindsay Cooper

27 Lindsay Cooper

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Lindsay Cooper has concurred in the aforementioned filing.

/s/ Charles K. Verhoeven

Charles K. Verhoeven